

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY
CAMDEN VICINAGE**

**IN RE: VALSARTAN, LOSARTAN,
AND IRBESARTAN PRODUCTS
LIABILITY LITIGATION**

This Document Relates to All Actions

MDL No. 2875

Honorable Robert B. Kugler,
District Court Judge

[PROPOSED]

**ORDER GRANTING
MOTION TO COMPEL
PRODUCTION OF
DOCUMENTS AND DATA
RELEVANT TO
PLAINTIFF'S DAMAGES
AND SETTING
DEADLINES RELATED TO
DAMAGES EXPERTS**

ORDER

THIS MATTER, having been opened to the Court by Defendants Zhejiang Huahai Pharmaceutical Co., Ltd., Huahai US Inc., Prinston Pharmaceutical Inc. d/b/a Solco Healthcare LLC, Solco Healthcare US, LLC, Teva Pharmaceuticals USA, Inc., Actavis Pharma, Inc., Actavis, LLC, and Torrent Pharma Inc. (collectively, the “TPP Defendants”) for entry of an order compelling the production of various documents and data related to the claimed damages of Plaintiff MSP Recovery Claims, Series LLC (“MSPRC”), and to set deadlines for damages experts, and the Court having considered the submissions of the parties and having heard oral

argument, and for good cause shown, **IT IS HEREBY ORDERED** that the TPP Defendants' Joint Motion to Compel is **GRANTED** in its entirety.

MSPRC is ordered to produce, within thirty (30) days of the date of this order, all documents responsive to Defendants' Request 2 concerning Subsidy, Reimbursement, and Rebate Data; all documents responsive to Defendants' Request 3 concerning CMS Bids; and all documents concerning Defendants' Request 4 concerning Internal Reporting.

IT IS FURTHER ORDERED that the following deadlines shall apply to discovery and Rule 702/*Daubert* briefing as to damages experts for the TPP Trial of MSPRC's claims as assignee of Group Health Incorporated and Health Insurance Plan of Greater New York, also known as EmblemHealth, and Summacare, Inc.:

- **December 19, 2022:** MSPRC to serve damages expert report(s);
- **February 6, 2023:** TPP Defendants to serve damages expert report(s);
- **March 31, 2023:** Deadline to complete damages expert depositions;
- **April 3, 2023:** Deadline for Rule 702/*Daubert* motions on damages experts
- **April 24, 2023:** Deadline for responsive briefs on Rule 702/*Daubert* motions on damages experts
- **May 8, 2023:** Deadline for reply briefs on Rule 702/*Daubert* motions on damages experts

SO ORDERED this ____ day of _____, 2022

Hon. Thomas I. Vanaskie, (Ret.)
Special Master